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May 29, 2020

Honorable James D. Peterson  
United States District Judge  
United District Court  
120 North Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Charles M. Raimondi Sr.*  
Case No. 16-cr-88-jdp

Dear Judge Peterson:

I write to update the Court on the defense's efforts to respond to its post-motion order (DE 44). Counsel has attempted to find an appropriate residence for Mr. Raimondi. It expects to be able to submit to the U.S. Probation Office such a residence as part of a broader release plan by Friday, June 5, 2020, *viz.*, one week from today.

Of course, if a plan comes together sooner, counsel will pass it along to the USPO immediately. Conversely, if the defense determines that no plan that meets the requirements in the Court's order is feasible, it will notify the Court by filing a subsequent letter.

Sincerely,

/s/ Peter R. Moyers

Peter R. Moyers  
Associate Federal Defender